



JOHN NAIMO  
AUDITOR-CONTROLLER

## COUNTY OF LOS ANGELES DEPARTMENT OF AUDITOR-CONTROLLER

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June 10, 2016

TO: Supervisor Hilda L. Solis, Chair  
Supervisor Mark Ridley-Thomas  
Supervisor Sheila Kuehl  
Supervisor Don Knabe  
Supervisor Michael D. Antonovich

FROM: John Naimo  
Auditor-Controller

A handwritten signature in blue ink that reads "John Naimo".

SUBJECT: **REVIEW OF PROBATION DEPARTMENT'S COMPLIANCE WITH THE  
DEPARTMENT OF JUSTICE SETTLEMENT AGREEMENT FOR THE  
JUVENILE CAMPS**

We completed a review to evaluate Probation Department's (Probation or Department) continued compliance with five of the 42 provisions included in the Department of Justice (DOJ) settlement agreement. In February 2015, the DOJ noted in their final monitoring report that the County implemented all the settlement agreement provisions. A summary of the monitoring results for all 23 provisions is included in Attachment II and descriptions of the provisions are included in Attachment III.

### **Background and Scope**

On August 17, 2010, the Board of Supervisors instructed the Auditor-Controller to monitor Probation's progress in implementing the DOJ settlement agreement provisions, using the monitoring tools developed by Probation and the DOJ Monitor. The monitoring tools for 20 provisions include specific criteria that result in a precise score. A score of 90% or higher means that Probation has achieved "substantial compliance" with the requirements of the provision. The monitoring tools for three provisions (Provisions 17, 43, and 73) evaluate achievements of specific expectations which have a "substantial compliance" level of at least 80%.

During this review, we continued to use these standards and evaluated Probation's continued compliance with the following five provisions at the 14 juvenile camps and two specialized units (camps/units). The review period covered one month at each camp/unit between October 2014 through April 2015:

- Provision 17 – Rehabilitation and Behavior Management
- Provision 20 – Child Abuse Reporting
- Provision 32 – Training (Suicide Prevention)
- Provision 43 – Substance Abuse
- Provision 73 – Increased Access to Community Alternatives

At the time of our review, the DOJ approved monitoring tools requiring a 90% compliance rate for Provisions 20 and 32. After our review, Probation indicated that the substantial compliance level for those two provisions was reduced to 80%. Probation further indicated that the change was a result of moving from a process-based to an outcome-based approach to monitoring. The DOJ Monitor confirmed that an 80% compliance level is sufficient. However, for this review, we used the 90% compliance rate which is consistent with our approach used in the previous 12 monitoring reviews.

### **Results of Review**

For **Provision 73**, Probation maintained substantial compliance at all 14<sup>1</sup> camps/units. For the remaining four provisions, we noted that:

- For **Provision 17**, Probation maintained substantial compliance at 13 (87%) of the 15<sup>1</sup> camps/units. For the remaining two camps/units, Probation did not maintain the 80% substantial compliance rate as required. For example, Probation did not document justification for issuing daily behavior management program rewards to four (67%) of the six ineligible minors reviewed at one camp/unit, and did not document why four (16%) of the 25 minors reviewed at one camp/unit did not complete Aggression Replacement Training sessions.

*Probation's attached response indicates that they will re-emphasize the importance of documentation and work with the camps/units to improve and standardize their documentation process.*

- For **Provision 20**, Probation maintained substantial compliance at 15 (94%) of the 16 camps/units. For the remaining camp/unit, Probation did not maintain the 90% substantial compliance rate. It should be noted that the camp/unit still did not maintain the reduced substantial compliance rate of at least 80%.

*Probation's attached response indicates that they will send out a notice reiterating the training requirements and request that staff who have not been trained attend the next available session. In addition, Probation indicated that management will monitor training records to ensure that all camp/unit personnel comply with the training requirements.*

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<sup>1</sup> Some of the settlement agreement provisions only apply to some of the camps/units due to the differences in juvenile populations and services among the camps/units.

- For **Provision 32**, Probation maintained substantial compliance at 15 (94%) of the 16 camps/units. For the remaining camp/unit, Probation did not maintain the 90% substantial compliance rate. It should be noted that the camp/unit did maintain the reduced substantial compliance rate of 80%.

*Probation's attached response indicates that they will send out a notice reiterating the training requirements and request that staff who have not been trained attend the next available session. In addition, Probation indicated that management will monitor training records to ensure that all camp/unit personnel comply with the training requirements.*

- For **Provision 43**, Probation maintained substantial compliance at 12 (86%) of the 14<sup>1</sup> camps/units. For the remaining two camps, Probation did not maintain the 80% substantial compliance rate as required. For example, Probation did not maintain adequate documentation (e.g., sign-in sheets) to support that the minors participated in at least 80% of the substance abuse treatment sessions. Specifically, the Department only provided documentation to support that the minors attended 186 (72%) out of the 260 sessions.

*Probation's attached response indicates that they will re-emphasize the importance of documenting minors' participation in substance abuse sessions and work with the camps/units to improve their documentation process.*

Probation management needs to ensure that staff assigned to the camps/units receive the appropriate training, staff are instructed on the importance of documenting the justification for any deviation from policy, and minors enrolled in substance abuse treatment participate in at least 80% of the sessions.

Details of our review are attached.

### **Review of Report**

We thank Probation and Department of Mental Health management and staff for their cooperation and assistance during our review. If you have any questions please call me, or your staff may contact Aggie Alonso at (213) 253-0304.

JN:AB:PH:AA

#### Attachments

- c: Sachi A. Hamai, Chief Executive Officer  
Calvin C. Remington, Interim Chief Probation Officer  
Robin Kay, Ph.D., Acting Director, Department of Mental Health  
Mitchell H. Katz, M.D., Director, Los Angeles County Health Agency  
Debra Duardo, Superintendent, Los Angeles County Office of Education  
Public Information Office  
Audit Committee

**LOS ANGELES COUNTY PROBATION DEPARTMENT JUVENILE CAMPS  
DEPARTMENT OF JUSTICE SETTLEMENT AGREEMENT MONITORING**

**Background and Scope**

On August 17, 2010, the Board of Supervisors instructed the Auditor-Controller to monitor the Probation Department's (Probation or Department) progress in implementing the Department of Justice (DOJ) settlement agreement provisions using the monitoring tools developed by Probation and the DOJ Monitor. The monitoring tools for 20 provisions include specific criteria that result in a precise score. A score of 90% or higher means that Probation has achieved "substantial compliance" with the requirements of the provision. The monitoring tools for three provisions (Provisions 17, 43, and 73) evaluate achievements of specific expectations which have a "substantial compliance" level of at least 80%. In February 2015, the DOJ noted in their final monitoring report that the County implemented all the settlement agreement provisions.

During this review, we continued to use these standards and evaluated Probation's continued compliance with the following five provisions at the 14 juvenile camps and two specialized units (camps/units). The review period covered one month at each camp/unit between October 2014 through April 2015:

- Provision 17 – Rehabilitation and Behavior Management
- Provision 20 – Child Abuse Reporting
- Provision 32 – Training (Suicide Prevention)
- Provision 43 – Substance Abuse
- Provision 73 – Increased Access to Community Alternatives

At the time of our review, the DOJ approved monitoring tools requiring a 90% compliance rate for Provisions 20 and 32. After our review, Probation indicated that the substantial compliance level for those two provisions were reduced to 80%. Probation further indicated that the change was a result of moving from a process-based to an outcome-based approach to monitoring. The DOJ Monitor confirmed that an 80% compliance level is sufficient. However, for this review, we used the 90% compliance rate which is consistent with our approach used in the previous 12 monitoring reviews.

**Provision 17 – Rehabilitation and Behavior Management**

The DOJ settlement agreement requires Probation to:

- Provide formal daily programming that incorporates education, recreation, and specialized rehabilitative and/or treatment programs for the minors and incorporate a points-driven behavior management program that addresses negative behavior and rewards positive behavior. This requirement applies to 15 camps/units.

- Provide either Aggression Replacement Training (ART) or Dialectical Behavior Therapy to each minor and for the minors to attend at least 80% of their assigned sessions. This requirement applies to 14 camps/units.
- Only isolate minors in a Special Handling Unit (SHU) as a last resort and to prevent, or in response to, violent or aggressive behavior. In addition, Probation must document justification for extending a minor's isolation past eight hours prior to the extension, and must separately document justification for isolating a minor in a SHU for 24 consecutive hours or more. This requirement applies to 14 camps/units.

Overall, two (13%) of the 15 camps/units did not maintain at least an 80% substantial compliance rate with Provision 17 as required. Specifically, Probation did not:

- Document justification for issuing daily behavior management program rewards to four (67%) of the six ineligible minors reviewed at one camp/unit.
- Document why four (16%) of the 25 minors reviewed at one camp/unit did not complete ART sessions.
- Document justification for referring one (25%) of the four minors sent to the SHU at one camp/unit.
- Appropriately document justification for keeping a total of two minors in a SHU past eight hours at two camps/units.

Inappropriately or inaccurately awarding behavior management program rewards diminishes the effectiveness of the behavior management program. Probation needs to ensure staff are instructed on the importance of documenting the justification for any deviation from policy. In addition, Probation needs to ensure Probation staff appropriately document justification for keeping a minor in the SHU past eight hours.

### **Provision 20 – Child Abuse Reporting**

The DOJ settlement agreement requires Probation to develop policies, practices, and procedures to define those circumstances in which staff must report allegations of child abuse or neglect to the appropriate external agencies. In addition, Probation, Los Angeles County Office of Education (LACOE), and Juvenile Court Health Services (JCHS) staff are required to attend training on the policies, practices, and procedures.

Probation developed policies, practices, and procedures that define when staff must report allegations of child abuse or neglect. In addition, Probation maintained substantial compliance at 15 (94%) of the 16 camps/units. For the remaining camp/unit, Probation did not maintain the 90% substantial compliance rate with Provision 20's training requirements. Probation needs to ensure that all staff attend the required Child Abuse Reporting training.

**Provision 32 – Training (Suicide Prevention)**

The DOJ settlement agreement requires that all Probation, Department of Mental Health, LACOE, and JCHS camp staff who work with youth are sufficiently trained in suicide prevention so that they understand how to prevent and respond to crises.

Probation management developed a training class on suicide prevention. In addition, Probation maintained substantial compliance at 15 (94%) of the 16 camps/units. For the remaining camp/unit, Probation did not maintain the 90% substantial compliance rate with Provision 32's training requirements. Probation needs to ensure that all staff attend the required Suicide Prevention training.

**Provision 43 – Substance Abuse**

The DOJ settlement agreement requires Probation to provide substance abuse treatment for minors who have a confirmed diagnosis or are otherwise identified as needing substance abuse treatment. The Department must document when a minor refuses treatment and make a reasonable attempt to redirect the minor back to treatment. In addition, Probation is required to take steps to prevent the youth from having access to illegal drugs. The Department should also ensure that minors attending a substance abuse treatment program participate in at least 80% of the sessions. This provision applies to 14 camps/units.

Two (14%) of the 14 camps/units did not maintain at least an 80% substantial compliance rate with Provision 43. Specifically, for the 71 minors reviewed that were enrolled in a substance abuse treatment program, Probation did not:

- Maintain adequate documentation (e.g., sign-in sheets) to support that the minors participated in at least 80% of the sessions. Specifically, the Department only provided documentation to support that the minors attended 186 (72%) out of the 260 sessions.
- Document the reasons why three (4%) of the 71 minors refused to attend substance abuse sessions.

Probation should ensure their staff document the reasons minors refuse to attend substance abuse treatment and ensure that minors participate in at least 80% of the sessions.

**Provision 73 – Increased Access to Community Alternatives**

The DOJ settlement agreement requires Probation to promote the rehabilitation of minors by increasing access to community-based alternatives, consistent with public safety and the best interest of the minors. The Department is required to:

- Minimize juvenile hall and camp confinement to minors who pose a risk to public safety and when the utilization of a less restrictive environment (e.g., home, housing with a relative, etc.) is not appropriate.
- Ensure that minors transitioning into the community have access to community-based treatment and support services. This requirement applies to 14 camps/units.
- Conduct Multidisciplinary Team (MDT) meetings with the minors to address their treatment and service needs and include their parent/guardian, camp/unit Probation Officer, and Aftercare Probation Officer. Probation must conduct initial MDT meetings for all minors within 14 days of their arrival at the camps/units, and transitional MDT meetings at least 30 days prior to their release.

All 14 camps/units maintained at least 80% substantial compliance rate with Provision 73 requirements. Probation appropriately minimized camp and hall confinement to minors who posed a risk to public safety, and ensured that minors transitioning into the community had access to treatment and support services.

**DOJ SETTLEMENT AGREEMENT FOR PROBATION JUVENILE CAMPS  
PROVISIONS MONITORED BY THE AUDITOR-CONTROLLER (A-C)  
SUMMARY OF DOJ MONITORING RESULTS  
OCTOBER 2014 THROUGH APRIL 2015**

***Five Provisions Monitored During This Review Period***

Provision	Description	Fully Implemented (a)	A-C Results
17	Rehabilitation and Behavior Management	10/31/2014	(b)
20	Child Abuse Reporting	10/30/2012	93% (c)
32	Training (Suicide Prevention)	10/30/2012	93% (c)
43	Substance Abuse	6/13/2014	(b)
73	Increased Access to Community Alternatives	12/13/2014	(b)

***Eighteen Provisions Not Monitored During This Review Period***

Provision	Description	Fully Implemented (a)
10	Use of Force	12/31/2012
11	Oleoresin Capsicum (OC or Pepper) Spray	2/27/2012
12	Use of Force Review	10/31/2012
14	Consumption of Alcohol by Staff	2/27/2012
16	Orientation	11/29/2011
18	Staff Training and Supervision of Youth	10/31/2012
19	Reduction of Youth-on-Youth Violence (YOYV)	12/31/2012
21	Child Abuse Investigation	10/31/2012
23	Grievance System	2/27/2012
24	Youth Movement Between Probation Camps and/or Halls	10/31/2011
25	Development and Implementation of Suicide Prevention Policy	10/31/2011
27	Management of Suicidal Youth	10/31/2012
29	Documentation of Suicide Precautions	10/31/2012
30	Supervision of Youth at Risk of Self-Harm	10/31/2012
31	Suicide Precautions for Youth Awaiting Transfer to Another Facility	10/31/2012
34	Screening	2/27/2012
45	Staff Understanding of Mental Health and Developmental Disability Needs	10/30/2012
46	Discharge Summaries	2/27/2012

**Footnote Legend**

- (a) The DOJ Monitor indicated that Probation fully met the requirements of these provisions by maintaining substantial compliance for 12 consecutive months (14 consecutive months for Provisions 10 and 19).
- (b) For Provisions 17, 43, and 73, the monitoring tools measure achievements of specific expectations which have a substantial compliance level of at least 80%. During our review, 13 (87%) of the 15 applicable camps/units maintained substantial compliance with Provision 17, 12 (86%) of the 14 applicable camps/units maintained substantial compliance with Provision 43, and all 14 applicable camps/units maintained substantial compliance with Provision 73.
- (c) Percentage is the average compliance level of all 16 camps/units.



**PROBATION DEPARTMENT JUVENILE CAMPS  
DOJ SETTLEMENT AGREEMENT PROVISIONS**

**Five Provisions Monitored During This Review Period**

**Provision 17 – Rehabilitation and Behavior Management:** The County shall provide adequate rehabilitative programming and gender-specific programming, where appropriate. The County shall provide a facility-wide behavioral management system that is implemented throughout the day, including school time.

**Provision 20 – Child Abuse Reporting:** The County shall develop policies, practices, and procedures to define those circumstances in which staff must report allegations of child abuse or neglect to the appropriate external agencies.

**Provision 32 – Training (Suicide Prevention):** The County shall ensure that all camp staff who work with youth are sufficiently trained in suicide prevention so that they understand how to prevent and respond to crises, including practical matters such as the location and use of a cut-down tool in the event of a youth's attempted hanging.

**Provision 43 – Substance Abuse:** The County shall develop and implement policies, procedures, and practices to address substance abuse disorders appropriately.

**Provision 73 – Increased Access to Community Alternatives:** The County agrees to ensure that treatment and services referenced in the Memorandum of Agreement are provided in the least restrictive setting, consistent with public safety, the best interests of the youth, and the goal of rehabilitation.

**Eighteen Provisions Not Monitored During This Review Period**

**Provision 10 – Use of Force:** The County shall develop and implement a comprehensive policy and accompanying practices governing use of force, ensuring that the least amount of force necessary for the safety of staff, youth residents, and visitors is used on youth.

**Provision 11 – Oleoresin Capsicum (OC or Pepper) Spray:** The County shall develop and implement policies, procedures, and practices to restrict the use of OC spray to appropriate circumstances, enable supervisors to maintain appropriate controls over spray use and storage, restrict the carrying of OC spray to only those individuals who need to carry and use it, prevent, wherever possible, the use of OC spray on populations for whom its use is contraindicated or contrary to doctors' instructions, and ensure that decontamination occurs properly.

**Provision 12 – Use of Force Review:** The County shall develop and implement a system for review of use of force and alleged child abuse by senior management so that they can use the information gathered to improve training and supervision of staff, guide staff discipline, and/or make policy or programmatic changes as needed.

**Provision 14 – Consumption of Alcohol by Staff:** The County shall ensure that staff at the Probation camps do not maintain or consume alcohol at the camps.

**Provision 16 – Orientation:** The County shall ensure that all youth, including those who are disabled or Limited English Proficient, receive orientation sufficient to communicate important information, such as how to access the grievance system, medical care, and mental health services, or report staff misconduct.

**Provision 18 – Staff Training and Supervision of Youth:** The County shall ensure that staff who work with youth residents have the knowledge and skills needed to effectively manage youth, including de-escalation techniques, crisis intervention, youth development, and supervision.

**Provision 19 – Reduction of Youth-on-Youth Violence (YOYV):** The County shall develop and implement strategies for reducing YOYV that includes training staff in appropriate behavior management, recognition and response to gang dynamics, and violence reduction techniques.

**Provision 21 – Child Abuse Investigation:** The County shall develop and implement a system for the timely, thorough, and independent investigation of alleged child abuse. Staff who are the subject of an allegation of child abuse shall be removed from direct youth supervision pending the outcome of the referral or investigation.

**Provision 23 – Grievance System:** The County shall develop an effective grievance system to which youth have access when they have complaints, ensure that grievances may be filed confidentially, and ensure that they receive appropriate follow-up, including informing the author of the grievance about its outcome, and tracking implementation of resolutions. The County shall ensure that the grievance system provides youth with a safe avenue to report abuse, staff misconduct, or unfair treatment.

**Provision 24 – Youth Movement Between Probation Camps and/or Halls:** The County shall ensure that movement of youth residents between facilities does not interfere with ongoing testing or provision of medical, mental health, or educational services at the Probation camps, unless court proceedings, treatment, or security needs require such movement.

**Provision 25 – Development and Implementation of Suicide Prevention Policy:** The County shall develop and implement adequate policies, procedures, and practices relating to suicide prevention.

**Provision 27 – Management of Suicidal Youth:** The County shall develop and implement policies, procedures, and practices to ensure that mental health staff are sufficiently involved with Probation and education staff in the management of youth exhibiting suicidal behaviors, including creation of individual behavior modification programs, and decisions and appropriate clothing, bedding, and housing.

**Provision 29 – Documentation of Suicide Precautions:** The County shall develop and implement policies, procedures, and practices to ensure that the following information is thoroughly and correctly documented, and provide information to all staff who need to know such information: a) the times youth are placed on and removed from precautions; b) the levels of precautions on which youth are maintained; c) the housing locations of youth on precautions; d) the conditions of the precautions; and e) the times and circumstances of all observations by staff monitoring the youth.

**Provision 30 – Supervision of Youth at Risk of Self-Harm:** The County shall sufficiently supervise youth newly assigned to a camp, youth in seclusion, and other youth at heightened risk of self-harm to maintain their safety.

**Provision 31 – Suicide Precautions for Youth Awaiting Transfer to Another Facility:** The County shall develop and implement policies, practices, and procedures to ensure that adequate suicide precautions are provided to youth who are awaiting transfer to another facility for mental health assessment.

**Provision 34 – Screening:** The County shall develop and implement policies, procedures, and practices for initial mental health screening to allow the identification of previously diagnosed and potentially existing mental health or substance abuse disorders, including potential suicidality. Such screening shall take place within 48 hours prior to a youth's delivery to a camp, or within 24 hours after a youth's arrival at the camp.

**Provision 45 – Staff Understanding of Mental Health and Developmental Disability Needs:** The County shall ensure that all staff working with youth residents have the skills and information necessary to understand behaviors of, engage in appropriate interactions with, and respond to needs of youth with mental illness and developmental disabilities.

**Provision 46 – Discharge Summaries:** The County shall provide aftercare planning and discharge summaries for youth leaving the facility who have, or have had, open mental health cases at a camp to facilitate treatment in future placements.



## COUNTY OF LOS ANGELES PROBATION DEPARTMENT

9150 E. Imperial Highway, Downey, CA 90242

(562) 940-2501



**CALVIN C. REMINGTON**  
Interim Chief Probation Officer

June 2, 2016

TO: John Naimo  
Auditor-Controller

FROM: Calvin C. Remington,  
Interim Chief Probation Officer

SUBJECT: **PROBATION DEPARTMENT'S RESPONSE TO THE AUDITOR-CONTROLLER'S REVIEW OF THE DEPARTMENT OF JUSTICE SETTLEMENT COMPLIANCE AT THE CAMPS**

Attached is Probation Department's (Department) response to the findings contained in the Auditor-Controller's 13<sup>th</sup> Status Report on the Department of Justice (DOJ) Agreement compliance at the camps. The Department remains committed to taking the necessary corrective action to ensure ongoing compliance with the Department of Justice Settlement Agreement, including ensuring that non-sworn personnel working at the camps/units attend training on Probation's policies.

The Department has continued to conduct monthly reviews of its camps to ensure that quality treatment is provided to juveniles in a safe and secure setting. For the period of October 2014 through April 2015, the Department's monitoring reviews determined that Probation maintained compliance with each provision of the DOJ Settlement Agreement.

I would like to thank you and your staff for your review of the Department's compliance with the DOJ Settlement Agreement and appreciate the opportunity to include our response with the release of your Audit.

Please contact me if you have any questions, or your staff may contact Jennifer Donnell at (562) 940-2835.

CCR:DR:FC:jd

Attachment

***Rebuild Lives and Provide for Healthier and Safer Communities***

**PROBATION DEPARTMENT'S RESPONSE TO AUDITOR-CONTROLLER REVIEW OF DOJ  
SETTLEMENT COMPLIANCE AT THE CAMPS**

**Provision 17 – Rehabilitation and Behavior Management**

**Auditor-Controller Findings:**

Probation did not:

- A. Document the justification for issuing daily behavior management program rewards to four (67%) of the six ineligible minors reviewed at one camp/unit.
- B. Document why four (16%) of the 25 minors reviewed at one camp/unit did not complete ART sessions.
- C. Document the justification for referring one (25%) of four minors sent to the SHU at one camp/unit.
- D. Appropriately document the justification for keeping two minors in SHU past eight hours at two camps/units.

**Probation's Response:**

The Probation Department agrees with the findings.

The Residential Treatment Services Bureau Chief will email all Camp managers to re-emphasize the importance of documenting decisions. The Bureau Chief will also work with the camps/units included in the findings to improve and standardize their documentation processes.

**Provision 20 – Child Abuse Reporting**

**Auditor-Controller Finding:**

Not all personnel at one camp/unit had attended the required Child Abuse training class.

**Probation's Response:**

The Probation Department agrees with the finding.

The Auditor-Controller noted a group of non-sworn personnel at one camp/unit who had not attended the Child Abuse training class. Three employees work for Probation's Management Services Administration Division while the remaining personnel, as noted by Auditor-Controller staff, worked for our partner organizations. The Residential Treatment Services' Bureau Chief will prepare a letter to each of the partner organizations reiterating DOJ's training requirements and requesting that staff who have not taken the class be scheduled to attend the next available

Attachment

training class. In addition, the Bureau Chief will be required to periodically monitor training records to ensure that all camp/unit personnel meet DOJ's training requirements.

**Provision 32 – Training (Suicide Prevention)**

**Auditor-Controller Finding:**

Not all personnel at one camp/unit had attended the required Suicide Prevention training class.

**Probation's Response:**

The Probation Department agrees with the finding.

At one camp/unit, the Auditor-Controller noted non-sworn personnel from our partner organizations who had not attended the Suicide Prevention class. To ensure that all staff receive the required DOJ training, the Residential Treatment Services' Bureau Chief will be required to prepare a letter to each partner organization to reiterate DOJ's training requirements and that all camp/unit personnel attend the next available Suicide Prevention training class as appropriate. In addition, the Bureau Chief will be required to periodically monitor camp/unit personnel training records to ensure DOJ's training requirements are met.

**Provision 43 – Substance Abuse**

**Auditor-Controller Findings:**

Probation did not:

- A. Maintain adequate documentation to support minors' participation in at least 80% of the substance abuse sessions at two camps/units.
- B. Document the reasons why three minors refused to attend substance abuse sessions at two camps/units.

**Probation's Response:**

The Probation Department agrees with the findings.

The Residential Treatment Services' Bureau Chief will notify all Camp managers to re-emphasize the importance of documenting the participation (or non-participation) of minors in substance abuse sessions. The Bureau Chief will also be required to work with the camps/units to improve their documentation processes.